

HWP Gasconade
GRIMCO Signs, Inc.
LOW # 95-J.C.011
396169

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Mel Carnahan, Governor • David A. Shott, Director

DIVISION OF ENVIRONMENTAL QUALITY

Jefferson City Regional Office

1511 Christy Drive P.O. Box 176 Jefferson City, MO 65102-0176
(314)751-2729

FAX (314)751-0014

October 5, 1995

CERTIFIED MAIL # Z 062 474 066
RETURN RECEIPT REQUESTED

Mr. Dale Kleinheider, President
GRIMCO Signs, Inc.
#1 L & D Drive
Owensville, MO 65066

Dear Mr. Kleinheider:

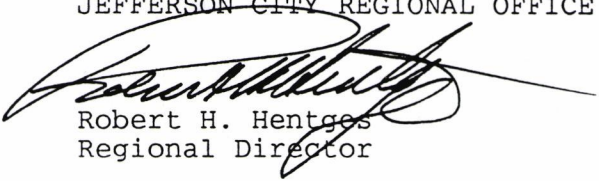
Enclosed is a report of a compliance evaluation inspection conducted on September 18, 1995, by James M. Wells of the Jefferson City Regional Office, Missouri Department of Natural Resources. The inspection was conducted pursuant to the Resource Conservation and Recovery Act and the Missouri Hazardous Waste Management Law, Rules and Regulations.

Areas of noncompliance are addressed in the unsatisfactory features section of the report. These unsatisfactory features require a written response to each violation which includes documentation of all corrective actions taken and/or a schedule for completion of all necessary corrective actions.

Your written response as explained above is due within 30 days of receipt of this letter. Please direct your response to my attention at the above letterhead address, and mail a copy to Mr. Tom Judge, Acting Chief of Enforcement Unit, Hazardous Waste Program, P. O. Box 176, Jefferson City, Missouri, 65102. You may call James M. Wells of my staff at (314)751-2729 if you have any questions regarding the report or this letter.

Sincerely,

JEFFERSON CITY REGIONAL OFFICE


Robert H. Hentges
Regional Director

RHH/jwk

Enclosure

c: Tom Judge, Hazardous Waste Program


R00153833
RCRA RECORDS CENTER

MI RI HAZARDOUS WASTE MANA T LAW
REPORT OF INVESTIGATION
October 5, 1995

FACILITY

GRIMCO SIGNS, INC.
#1 L & D Drive
Owensville, Missouri 65066
(314) 437-2115

EPA ID #: MOD981506272
Mo. Generator ID: 004235

PARTICIPANTS

Department of Natural Resources James M. Wells
 Environmental Specialist
 Jefferson City Regional Office

GRIMCO SIGNS, INC.

Dale Kleinheider
President

Ron Gehlert
Plant Manager

INTRODUCTION

A Hazardous Waste Compliance Investigation was conducted at GRIMCO Signs, Inc. (GSI), Owensville Missouri, on September 18, 1995. The investigation was conducted under the authority of Sections 260.375(9) and 260.377 RSMo for the purpose of determining the compliance status of the facility relating to hazardous waste handling and disposal. The investigation was prompted by a caller questioning whether or not GSI's handling of solvent rags and powder paint waste was appropriate. This facility was inspected as a small quantity generator that accumulates hazardous waste in quantities greater than 1,000 KG (2,200 lbs).

FACILITY DESCRIPTION AND COMMENTS

GSI manufactures steel, aluminum and silk screened signs. They have two spray booths utilizing powder paint (non-solvent). The spray guns and lines are cleaned with air. The powder paint is said not to contain toxic characteristic metals. GSI has a roller coat operation for painting raised letter signs. This process requires xylene to clean the rollers. GSI has 3 hand screeners and 2 automatic screeners. The screens are cleaned with xylene soaked rags and will contain varying concentrations of ink. GRIMCO had an incident approximately 8 years ago involving the combustion of a fiber drum containing xylene soaked rags. The Owensville Fire Department responded and extinguished the smoldering rags. The fire marshall determined the fire to be spontaneous combustion. After the fire, on advice from the fire marshall, they changed their operation and began storing xylene soaked rags in a 30 gallon plastic trash pail. When they accumulate a few rags they add water to wash the rags and render

them non-ignitable. The rags are dumped into a solid waste trash dumpster. Review of Material Safety Data Sheets for GSI's inks show that some of the inks might contain lead sulfate, barium, or chromates. Mr. Kleinheider did not believe that the rags had ever been tested for toxic characteristic concentrations of metals. The method of treatment utilized is "deactivation". It was chosen as a safety measure to reduce the risk of fire.

Mr. Kleinheider stated that GSI is actively seeking alternatives to xylene. They believe that a citrus based cleaner may work for the silk screen process. However, they will need to find a substitute paint formula for the roller coat applicator.

The following waste streams are currently generated by GSI:

1. Waste Powder Paint Dust/Water Curtain Solids - This waste stream is reported to be non-hazardous. It is disposed in the solid waste dumpster.
2. Waste Xylene Soaked Rags, Washed With Water Prior to Disposal - This waste stream contains varying amounts of ink. Therefore, it will contain varying concentrations of metal. It is disposed in the solid waste dumpster. Rags are generated at the rate of 25 lbs/day, dry weight.
3. Waste Xylene Mixture - This D001/F003 waste is a mixture of paint and roller coat cleaner (xylene). It is generated at the rate of 1-2 drums per month. It is disposed of through fuel blending by RINECO Chemical Industries, Benton, Arkansas.
4. Used Oil - This waste stream is mixed with #3 above and disposed of as hazardous waste.
5. Waste Corrosive Liquid - This corrosive waste stream results from the cleaning of spray booth paint hooks. It is mixed with #3 above.

UNSATISFACTORY FEATURES

Federal regulations cited are those adopted by reference in state regulations or those for which the state has agreed to pursue enforcement action.

1. Failure of a generator of solid waste to adequately determine whether or not that waste is a hazardous waste; 10 CSR 25-5.262(1) incorporating 40 CFR 262.11. The waste xylene soaked rags were determined to be ignitable, and treated on-site by deactivation. The deactivation process would not treat the metals which may be contained in the ink. Therefore, a representative sample of the xylene soaked rags must be tested to determine if they contain toxic characteristic levels of lead, barium, or chromium. GSI should review material safety data sheets to determine if any other toxic characteristic metals might be present.

2. Failure to maintain the marking and labeling requirements for containers of hazardous waste; 10 CSR 25-5.262(2)(C)1. referencing 40 CFR 262.31 and 262.32. The drum of hazardous waste that was in the storage area was not marked or labeled in accordance with the Department of Transportation (DOT) requirements. The Missouri Hazardous Waste regulations require the containers to be marked and labeled during the entire on-site storage period.
3. Failure to provide the beginning date of accumulation on containers of hazardous waste; 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2). The date of accumulation must be provided on all containers of hazardous waste during the entire on-site storage period. The drum of hazardous waste that was in the storage area was not marked with the date of accumulation.
4. Failure to clearly mark containers as "hazardous waste"; 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3). The drum of hazardous waste in the storage area was not marked as "hazardous waste".
5. Failure to provide a containment system for stored waste; 10 CSR 25-5.262(2)(C)2.B.(I). Areas storing greater than 1000 kg (2200 lbs) of liquid hazardous waste must be provided with a leak-tight secondary containment system. GSI's off-site shipments since at least May 1993 have exceeded 1000kg. Therefore, they have stored greater than 1000kg prior to those shipments. GSI's waste storage area is sloped to drain to an aerated wastewater treatment unit.
6. Failure to train personnel to respond to emergencies including the use of alarm systems, emergency equipment and contingency plan; 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3). GSI does not have a formal training system in place to instruct employees regarding hazardous waste handling and emergency procedures.
7. Failure to maintain the personnel training plan on-site as required of large quantity generators and small quantity generators who accumulate hazardous waste in quantities exceeding 1000kg; 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d). The plan must contain, at a minimum, the following documents:
 - A. The job title, job description and name of employee filling each position related to hazardous waste management.
 - B. Written description of introductory and continuing training that will be given to each position.
 - C. Documentation of training completed by personnel.

- D. Records of current personnel maintained until facility closure; former employee records maintained for at least three years.
8. Failure to include the manifest document, identification and consecutive shipping numbers; 10 CSR 25-5.262(2)(B)2.A. The Missouri Hazardous Waste regulations require that the Missouri Manifest Document Number be provided on all manifests. The number consists of the five (5) digit Missouri generator's identification number followed by the consecutively increasing shipment number. The number can be provided in the Additional Information section of out-of-state manifests.
9. Failure to put the transporter's license plate number and Mo ID number on all manifests; 10 CSR 25-5.262(2)(B)2. Manifests are required to have the license plate number for the waste-carrying portion of the vehicle used to transport waste, including the state of registration. Manifests dating back to May 1993 were reviewed. Manifests number AR621488, AR610077, AR633190, and AR729512 did not have the transporters license plate number and state of registration. Manifests number AR621488, AR633190, and AR729512 did not have the transporters MO ID number.
10. Failure to put the specific gravity on all manifests where required; 10 CSR 25-5.262(2)(B)2. Manifests number AR621488, AR610077, AR585294, AR632190, AR660824, AR709190, AR729512, and AR768069 did not have the specific gravity of waste that was listed in units other than pounds.
11. Failure to ensure that out-of-state manifests contain all required Missouri information; 10 CSR 25-5.262(2)(B)4.A. The omitted information referenced in 8 & 9 above is required by Missouri Regulation and was omitted from out of state manifests.
12. Failure to file a one-time notification and certification that characteristic waste is no longer hazardous; 10 CSR 25-7.268(1) incorporating 40 CFR 268.9(d). Once a waste has been treated by the generator and is no longer hazardous, a one-time notification and certification must be placed in the generator's files and sent to the authorized state. A copy of Appendix 10 to Part 268 and a copy of 40 CFR 268.7(b)(5) is enclosed. Please reference the enclosure for content and wording of the notification/certification.

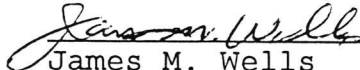
ADDITIONAL COMMENTS

GSI treats xylene soaked rags to render them non-ignitable, then places them in their solid waste dumpster. While this treats the characteristic of ignitability, it may not treat underlying hazardous constituents. Therefore, GSI must be aware that the land disposal restriction regulations contain universal treatment standards. If the treated rags fail the toxic characteristic test for metals or any other toxic characteristic constituent,

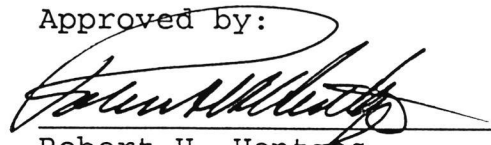
GRIMCO Signs, Inc
October 5, 1995
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that waste stream will still be a hazardous waste. Disposal in a sanitary landfill will not be allowed. If the contaminated rags were going to a laundry service for reuse, it would not be a regulated waste stream.

Submitted by:


James M. Wells
Environmental Specialist

Approved by:


Robert H. Hentges
Regional Director



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
SMALL QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

S

SQG-INSP.

ONLY FOR FACILITIES THAT GENERATE/ACCUMULATE < 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME <i>Grimco Signs, Inc.</i>		DATE <i>9-18-95</i>	EPA I.D. NUMBER <i>MO0981506272</i>
ADDRESS <i>#1 L&D Drive</i>		RR NO. <i>N/A</i>	MO I.D. NUMBER <i>004235</i>
CITY <i>Owensville</i>	NUMBER OF EMPLOYEES <i>46</i>	YEARS AT SITE <i>16</i>	TELEPHONE NUMBER <i>(314) 437-2115</i>

FACILITY REPRESENTATIVE(S), TITLE(S)

Dale Kleinheider, President; Ron Gehlert, Plant Manager

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT

Make steel, Aluminum & silk screened signs. A filter booth is used for painting one side of the sign & a water curtains booth is used for the other side. Both booths use powder paint; the guns & lines are cleaned w/air. They use a small amount of black, solvent based paint (~50 gallon/year). Grimco changed to powder paint ~ 1 1/2 years ago. Silk screening: Grimco has 3 hand screeners & 2 automatic screeners. They also have a roller coat sign printer for raised letter signs. About 8 yrs ago, Grimco had an incident involving spontaneous combustion of rags soaked w/xylene, stored in a fiber drum. After the incident, they began washing their xylene soaked rags in water to render them non-flammable, then they were dumped into the solid waste dumpster. Some of the inks contain TC metals.

WASTE STREAMS

	DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1.	<i>Powder paint dust/water curtain solids (scum) said to be non-hazardous</i>	<i>UNKNOWN</i>		<i>Kahle SLF</i>
2.	<i>Waste xylene soaked rags, soaked in water prior to putting in solid waste dumpster, VARYING concentration of ink on rags. Some ink contains metals - Pb, Ba, Cr.</i>	<i>25 lbs dry wt dry</i>		<i>"</i>
3.	<i>Waste paint solvents & roller coater cleaner (xylene)</i>	<i>1 1/2 days 1/2 month</i>	<i>D001 F003</i>	<i>RINECO ARKANSAS</i>
4.	<i>Used oil - Mixed w/ #3 above</i>			<i>RINECO</i>
5.	<i>Waste Corrosive liquid from cleaning spray Booth paint hooks - Mixed w/ #3 above</i>			<i>RINECO</i>

CHECK ALL THAT APPLY (Specify if possible)

- | | | |
|---|---|---|
| <input type="checkbox"/> NPDES Permit | <input type="checkbox"/> Lead/Acid Batteries | <input type="checkbox"/> POTW _____ |
| <input checked="" type="checkbox"/> Septic Tank for paint | <input type="checkbox"/> H.W. Burner/Blender/Marketer | <input type="checkbox"/> Solid Waste Landfill _____ |
| <input type="checkbox"/> Air Permit <i>Booth H₂O</i> | <input type="checkbox"/> Precious Metal Reclamation | <input type="checkbox"/> Waste Water Pretreatment |

A. GENERAL

1. <input checked="" type="checkbox"/> Registered as a HW Generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A)	GGR
2. <input checked="" type="checkbox"/> Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11	GGR
3. <input checked="" type="checkbox"/> Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo	GGR
4. <input checked="" type="checkbox"/> Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo	GGR
5. <input checked="" type="checkbox"/> Facility does not operate as a TSD - Section 260.390(1) RSMo	GGR

COMMENTS

Regs should be tested to determine if TC metals are present

PART 1: WALK-THROUGH INSPECTION**B. PRETRANSPORT, CONTAINERIZATION & STORAGE**

1. <input checked="" type="checkbox"/> Storage does not exceed 180 days (270 days if transported > 200 miles) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(e)	GSQ
2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.171	GPT
3. <input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.172	GPT
4. <input checked="" type="checkbox"/> Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a)	GPT
5. <input checked="" type="checkbox"/> Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.177(c)	GPT
6. <input checked="" type="checkbox"/> Containers of ignitable or reactive waste stored > 50 ft. from property line (or meet requirements) - 10 CSR 25-5.262 (2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265 (2)(I)3.	GOR
7. <input type="checkbox"/> Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262 (2)(C)1.	GOR
8. <input type="checkbox"/> Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2)	GPT
9. <input checked="" type="checkbox"/> Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(II)	GOR
10. <input type="checkbox"/> Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(I) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3)	GPT
11. <input checked="" type="checkbox"/> Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(II)	GPT
12. <input checked="" type="checkbox"/> Daily inspection of areas subject to spills, ie. waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)	GOR
13. <input checked="" type="checkbox"/> Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35	GPT
14. <input checked="" type="checkbox"/> Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33	GPT
15. <input checked="" type="checkbox"/> "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)	GOR
16. <input type="checkbox"/> Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR

COMMENTS

1 drum full no marking or labels - Grisco gets labels & manifests from the transporter.

setting on concrete floor - sloped to drain away from drum

Mixed w/ haz. waste

C. SATELLITE ACCUMULATION

1. <input type="checkbox"/> Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173	GPT
2. <input type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171	GPT
3. <input type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172	GPT
4. <input type="checkbox"/> Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)	GPT
5. <input type="checkbox"/> Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)3.	GPT
6. <input type="checkbox"/> Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.	GOR

COMMENTS

Accumulation not started in new drum.
need to label/mark drum w/ words "Hazardous Waste" or other descriptive words & date the drum w/ date accumulation starts.

<input type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	GOR	COMMENTS		
D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES				
1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31	GPT	<p>COMMENTS</p> <p>Since quantities > 1000 kg have been accumulated at one time, large quantity generator requirements Re: Contingency Plan & personnel training apply</p> <p>Have drawn up / not posted</p> <p>No program in place.</p> <p>* See large Quantity Generator Checklist</p>		
2. <input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) and properly tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265 Subpart C.	GPT			
3. <input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(d)	GPT			
4. <input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33	GPT			
5. <input checked="" type="checkbox"/> Emergency coordinator's name and phone number posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ			
6. <input checked="" type="checkbox"/> Telephone number of fire department posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ			
7. <input checked="" type="checkbox"/> Location of fire extinguisher and spill control equipment posted near phone - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)	GSQ			
8. <input checked="" type="checkbox"/> Employees familiar with waste handling and emergency procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii)	GSQ			
9. <input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a)	GPT			
10. <input checked="" type="checkbox"/> Telephone or two-way radio onsite and capable of summoning local fire or police dept. - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b)	GPT			
E. SQG TANKS				
TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1. <i>None</i>				
2.				
3.				
1. <input checked="" type="checkbox"/> Uncovered tanks have 2 ft. freeboard or containment system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(3)	GPT	<p>COMMENTS</p>		
2. <input checked="" type="checkbox"/> Continuously fed tanks equipped with a feed cut-off system or a proper by-pass system - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(4)	GPT			
3. <input checked="" type="checkbox"/> Waste and/or treatment method is compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(b)(2)	GPT			
4. <input checked="" type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(f)	GPT			
5. <input checked="" type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(1)	GPT			
6. <input checked="" type="checkbox"/> Ignitable or reactive wastes in covered tanks treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(e)(2)	GPT			
7. <input checked="" type="checkbox"/> Volatiles with vapor pressure > 78 mm Hg @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.D.(i)	GOR			
8. <input checked="" type="checkbox"/> Wastes and residues removed from tank and equipment, and handled properly upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(d)	GPT			
9. <input type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3).	GPT			

10. <input type="checkbox"/> Inspection of waste feed cut off, bypass system, monitoring data and freeboard each operating day - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)	GPT	COMMENTS
11. <input type="checkbox"/> Weekly inspection of confinement structure, construction materials and general area for leaks, corrosion or discharges - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(3) referencing 40 CFR 265.201(c)5	GPT	
12. <input type="checkbox"/> Waste oil tanks in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR	

PART 2: RECORDS INSPECTION

F. MANIFESTS

		COMMENTS
1. <input checked="" type="checkbox"/> Facility uses manifest system or wastes reclaimed under contractual agreement - 260.380.1(6) RSMo, and 10 CSR 25-5.262(2)(B)	GMR	
2. <input checked="" type="checkbox"/> Generator maintains a copy of the contractual agreement on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2)	GMR	
3. <input checked="" type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR	
4. <input checked="" type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)	GOR	
5. <input checked="" type="checkbox"/> Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A	GOR	several were missing the manifest. Document #
6. <input checked="" type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)1.	GMR	
7. <input checked="" type="checkbox"/> All transporters' names, phone numbers, license plate #s, MO & EPA I.D.#s - 10 CSR 25-5.262(2)(B)2.	GMR	# AR-621488 5-12-93 " 610077 2-24-93 and others.
8. <input checked="" type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)1.	GMR	
9. <input checked="" type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.	GMR	
10. <input checked="" type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.	GMR	same as the
11. <input checked="" type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)1.	GMR	
12. <input checked="" type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A	GOR	
13. <input checked="" type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1	GOR	
14. <input checked="" type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C	GRR	
15. <input checked="" type="checkbox"/> Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1	GOR	
16. <input checked="" type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	Rags going to SLF need to be tested for Toxic Characteristic metals & constituents
17. <input checked="" type="checkbox"/> "Land-Ban" notification/certification sent with manifests or with 1st shipment under a tolling agreement & retained on-site for 5 years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	Notification/certification for treated Rags not on file
18. <input checked="" type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	

G. PREPAREDNESS AND PREVENTION

1. <input checked="" type="checkbox"/> Arrangements with local emergency agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Emergency coordinator(s) on premise or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(i)	GSQ	

H. WASTE OIL

1. <input checked="" type="checkbox"/> Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D)	GOR	COMMENTS
2. <input checked="" type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(C)2	GOR	
3. <input checked="" type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	GOR	
4. <input checked="" type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	GOR	
5. <input checked="" type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	GOR	

I. RESOURCE RECOVERY

1. <input checked="" type="checkbox"/> RR certification for energy recovery or reclamation of waste oil or hazardous waste on-site - 10 CSR 25-9.020(1)(A)3	GOR
2. <input checked="" type="checkbox"/> Still bottoms or RR residues disposed of properly - Section 260.380-1(6) BSMo	GOR
3. <input type="checkbox"/> Facility is classified as U, R1, or R2 accurately - 10 CSR 25-9.020(3)(A).	GOR
4. <input type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(3).	GOR
5. <input type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E)1 and 2.	GOR
6. <input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR
7. <input type="checkbox"/> Facility maintains a complete written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) and (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR
8. <input type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR

COMMENTS

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

switched to powder paint - no solvents.
 & was up byson to eliminate use of xylene
 it was substitute for roller coat cleaner to
 completely eliminate xylene

INSPECTOR'S SIGNATURE

[Signature]

DATE

9-18-85



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
LARGE QUANTITY GENERATOR
INSPECTION RECORD AND CHECKLIST

L

LQG-INSP.

FOR FACILITIES THAT GENERATE/ACCUMULATE > 1000 Kg (2,200 lbs. or approximately, 5 drums)

NAME <i>Grimco Signs, Inc.</i>		DATE <i>9-18-95</i>	EPA I.D. NUMBER
ADDRESS		RR NO.	MO I.D. NUMBER
CITY <i>Owensville</i>	NUMBER OF EMPLOYEES	YEARS AT SITE	TELEPHONE NUMBER
FACILITY REPRESENTATIVE(S), TITLE(S)			

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT.

Grimco has in the past, routinely ~~shipped~~ accumulated quantities of hazardous waste (liquid) that exceeds 1000 kg (2,200 lbs). Therefore, Contingency Plan, Personnel Training, & waste containment system requirements for large quantity generators are applicable.

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1.			
2.			
3.			
4.			
5.			

CHECK ALL THAT APPLY (Specify if possible)

- | | | |
|---------------------------------------|---|---|
| <input type="checkbox"/> NPDES Permit | <input type="checkbox"/> Lead/Acid Batteries | <input type="checkbox"/> POTW _____ |
| <input type="checkbox"/> Septic Tank | <input type="checkbox"/> H.W. Burner/Blender/Marketer | <input type="checkbox"/> Solid Waste Landfill _____ |
| <input type="checkbox"/> Air Permit | <input type="checkbox"/> Precious Metal Reclamation | <input type="checkbox"/> Waste Water Pretreatment |

A. GENERAL

1	<input checked="" type="checkbox"/> Registered as a HW Generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A)	GGR
2	<input checked="" type="checkbox"/> Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11	GGR
3	<input checked="" type="checkbox"/> Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo	GGR
4	<input checked="" type="checkbox"/> Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo	GGR
5	<input checked="" type="checkbox"/> Facility does not operate as a TSD - Section 260.390(1) RSMo	GGR

COMMENTS

See SQG
checklist

PART 1: WALK-THROUGH INSPECTION**B. PRETRANSPORT, CONTAINERIZATION & STORAGE**

1	<input checked="" type="checkbox"/> Storage does not exceed 90 days or 180/270 days if facility generates < 1000 Kg/month - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)	GPT
2	<input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.171	GPT
3	<input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.172	GPT
4	<input checked="" type="checkbox"/> Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a)	GPT
5	<input checked="" type="checkbox"/> Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.177(c)	GPT
6	<input checked="" type="checkbox"/> Container storage areas have a containment system if holding more than 1000 Kg of liquid hazardous waste - 10 CSR 25-5.262 (2)(C)2.B.(I)	GOR
7	<input type="checkbox"/> Base of containment system is impervious and free of cracks or gaps - 10 CSR 25-5.262 (2)(C)2.B.(III)(a).	GOR
8	<input type="checkbox"/> Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(III)(b).	GOR
9	<input type="checkbox"/> Capacity of containment system = 10% of waste volume or volume of largest container, whichever is greater - 10 CSR 25-5.262(2)(C)2.B.(III)(c).	GOR
10	<input type="checkbox"/> Run-on onto the containment system is prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.B.(III)(d).	GOR
11	<input type="checkbox"/> Accumulated liquids removed to prevent overflow of containment - 10 CSR 25-5.262(2)(C)2.B.(III)(e).	GOR
12	<input type="checkbox"/> Containers of ignitable or reactive waste stored >50 ft. from property line (or meet requirements) - 10 CSR 25-5.262(2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I)7. and 8.	GPT
13	<input type="checkbox"/> Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)	GPT
14	<input type="checkbox"/> Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262(2)(C)1.	GOR
15	<input type="checkbox"/> Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2)	GPT
16	<input type="checkbox"/> Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(I) and (II) referencing 40 CFR 265.174	GPT
17	<input type="checkbox"/> Daily inspection of areas subject to spills, i.e., waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)	GOR
18	<input type="checkbox"/> Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.35	GPT
19	<input type="checkbox"/> Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33	GPT
20	<input type="checkbox"/> "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D.(II)	GOR
21	<input type="checkbox"/> Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR

COMMENTS

only 1 drum on-site at
time of inspection.
10 Drums (550 gallon)
shipped on 9-7-95

NO containment. Drums
stored in an area that
drains to a floor drain,
to an aerated waste-
water treatment tank.

see SQG
checklist

C. SATELLITE ACCUMULATION

1	<input checked="" type="checkbox"/> Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a)	GPT
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COMMENTS

2. <input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171	GPT	COMMENTS
3. <input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172	GPT	
4. <input checked="" type="checkbox"/> Quantities accumulated not exceeding 55 gal. (1 quart of acutely-hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)	GPT	
5. <input checked="" type="checkbox"/> Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(2).	GPT	
6. <input type="checkbox"/> Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.	GOR	
7. <input type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	GOR	

D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1. <input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.31	GPT	COMMENTS <i>see SQG checklist</i>
2. <input type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) - 10 CSR 25-5.262 (2)(C)2.E.	GPT	
3. <input type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(c) & (d)	GPT	
4. <input type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.34(a)	GPT	
5. <input type="checkbox"/> Telephone or two-way radio on-site and capable of summoning local fire or police department - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(b)	GPT	
6. <input type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.33	GPT	

E. LQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1. <i>LOPC</i>				
2.				
3.				
4.				
5.				

1. <input checked="" type="checkbox"/> Spill prevention controls in place and operating e.g. check valves, dry discount couplings - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(1)	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Overfill prevention controls in place and operating e.g. high level alarms, automatic feed cutoff, etc. - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(2)	GPT	
3. <input checked="" type="checkbox"/> Sufficient freeboard in uncovered tanks to prevent overtopping - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(b)(3)	GPT	
4. <input checked="" type="checkbox"/> Waste or treatment method compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.194(a)	GPT	
5. <input checked="" type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.199(a)	GPT	
6. <input checked="" type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(a)(1) and (2)	GPT	
7. <input checked="" type="checkbox"/> Ignitable or reactive wastes treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.198(b)	GPT	

8. <input checked="" type="checkbox"/>	Volatiles with vapor pressure > 78 mm @ 25° C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.D.(I)	GOR
9. <input checked="" type="checkbox"/>	Wastes and residues removed as hazardous waste and tank and equipment decontaminated upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.197(a)	GPT
10. <input checked="" type="checkbox"/>	Secondary containment system provided for tanks and equipment installed after July 14, 1986, storing dioxin waste, over 15 years old, of unknown age in facility over 15 years old; repaired, replaced or reinstalled after July 14, 1986 - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)	GPT
11. <input type="checkbox"/>	Secondary containment system constructed of or lined with impervious waste compatible material - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(1)	GPT
12. <input type="checkbox"/>	Containment system supported by base capable of preventing failure due to settlement, compression or uplift - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(2)	GPT
13. <input type="checkbox"/>	Containment system provided with a leak detection system capable of detecting a release within 24 hours - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(3)	GPT
14. <input type="checkbox"/>	Containment system sloped or designed to drain and remove liquids - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(b)	GOR
15. <input type="checkbox"/>	Containment system capable of containing 100% of the capacity of the largest tank - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(c)	GOR
16. <input type="checkbox"/>	Containment system free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(a)	GOR
17. <input type="checkbox"/>	Run-on onto containment system prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(d)	GOR
18. <input type="checkbox"/>	Spilled or leaked waste and precipitation removed from secondary containment within 24 hours or as soon as possible - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(4)	GPT
19. <input type="checkbox"/>	Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)	GPT
20. <input type="checkbox"/>	Daily inspections of overfill/spill control equipment, aboveground portions of tank system, secondary containment, and data gathered from monitoring equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(a)	GPT
21. <input type="checkbox"/>	Inspection log maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(c)	GPT
22. <input type="checkbox"/>	Cathodic protection systems inspected annually, impressed current sources every two months - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(b)	GPT
23. <input type="checkbox"/>	Detailed written assessment by an independent, qualified, professional engineer for tanks installed after July 14, 1986, prepared and on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.192	GPT
24. <input type="checkbox"/>	Written assessment by an independent, qualified, professional engineer prepared and on-site for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.191	GPT
25. <input type="checkbox"/>	Leak test, internal inspection or tank integrity exam performed annually and documented, by an independent, qualified, professional engineer for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(i)	GPT
26. <input type="checkbox"/>	Leak/spill response resulted in: waste flow stopped immediately; waste removal; containment and removal of visible releases to the environment; notification and report; and repair or closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.196	GPT

COMMENTS

PART 2: RECORDS INSPECTION

F. MANIFESTS

<input checked="" type="checkbox"/> Facility uses manifest system - 260.380.1.(6) RSMo. and 10 CSR 25-5.262(2)(B)	GMR
2. <input type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR
3. <input type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)	GOR
4. <input type="checkbox"/> Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A.	GOR
5. <input type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)2.	GMR
6. <input type="checkbox"/> All transporters' names, phone numbers, MO & EPA I.D.#'s, license plate # - 10 CSR 25-5.262(2)(B)2.	GMR
7. <input type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)2.	GMR
8. <input type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.	GMR
9. <input type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.	GMR
10. <input type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)2.	GMR
11. <input type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A.	GOR
12. <input type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1.	GOR
13. <input type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C.	GRR
14. <input type="checkbox"/> Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1.	GOR

COMMENTS

see SQ6
checklist

G. LAND DISPOSAL RESTRICTIONS

<input checked="" type="checkbox"/> Tests waste or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
2. <input checked="" type="checkbox"/> Dilution of waste to meet LDR treatment standards is not occurring - 10 CSR 25-7.268(1) incorporating 40 CFR 268.3(a)	GLB
3. <input type="checkbox"/> "Land-Ban" notification/certification, sent with manifests and retained on-site for five years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
4. <input type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB
5. <input checked="" type="checkbox"/> Waste analysis plan on-site and utilized if generator treats hazardous waste in tanks or containers to meet LDR treatment standards - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)(4)	GLB

COMMENTS

H. PERSONNEL TRAINING

1. <input checked="" type="checkbox"/> Personnel are trained to respond to emergencies including the use of alarm systems, emergency equipment and contingency plan - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3).	GPT
2. <input type="checkbox"/> Employees do not work in unsupervised positions until they have completed the training - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(b)	GPT
3. <input type="checkbox"/> Training reviewed annually - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(c)	GPT
4. <input type="checkbox"/> Program director trained in hazardous waste management procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(2)	GPT
5. <input checked="" type="checkbox"/> Personnel training plan on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)	GPT

COMMENTS

NO training plan or formal system in place

6. <input type="checkbox"/> Gives job title, job description and name of employee filling each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1) and (2)	GPT	COMMENTS
7. <input type="checkbox"/> Written description of introductory and continuing training that will be given to each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3)	GPT	
8. <input type="checkbox"/> Documentation of training completed by personnel - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(4)	GPT	
9. <input type="checkbox"/> Records of current personnel maintained until facility closure, former employee records maintained for at least three years - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(e)	GPT	

I. CONTINGENCY PLAN

1. <input checked="" type="checkbox"/> Contingency plan maintained on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(a).	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Plan submitted to local emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b)	GPT	
3. <input checked="" type="checkbox"/> Emergency coordinator on-site or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.55	GPT	
4. <input checked="" type="checkbox"/> Plan describes actions personnel must take in response to fires, explosions or other releases of hazardous waste - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(a)	GPT	
5. <input checked="" type="checkbox"/> Describes arrangements with emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c)	GPT	
6. <input checked="" type="checkbox"/> Lists names, addresses and phone numbers (home and office) of emergency coordinators - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)	GPT	
7. <input checked="" type="checkbox"/> Primary emergency coordinator designated - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)	GPT	
8. <input checked="" type="checkbox"/> List emergency equipment including description, location and capabilities - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e)	GPT	
9. <input type="checkbox"/> Evacuation plan, if applicable, designates primary and secondary routes and evacuation signal - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f)	GPT	

J. WASTE OIL

1. <input checked="" type="checkbox"/> Waste oil is managed properly and not disposed of into the environment - 10 CSR 25-11.010(1)(D).	GOR	COMMENTS see SQG checklist
2. <input checked="" type="checkbox"/> Listed hazardous waste mixed with waste oil is handled as a hazardous waste - 10 CSR 25-11.010(1)(C)2.	GOR	
3. <input type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	GOR	
4. <input type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	GOR	
5. <input type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	GOR	

K. RESOURCE RECOVERY

1. <input checked="" type="checkbox"/> RR certification for energy recovery or reclamation of waste oil or hazardous waste on-site - 10 CSR 25-9.020(1)(A)3.	GOR	COMMENTS
2. <input checked="" type="checkbox"/> Still bottoms or RR residues disposed of properly - Section 260.380.1(5) RSMo.	GOR	
3. <input type="checkbox"/> Facility is classified as U, R1 or R2 accurately - 10 CSR 25-9.020(3)(A).	GOR	
4. <input type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(30)(E)3.	GOR	
5. <input type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E) 1. and 2.	GOR	

6. <input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR	COMMENTS
7. <input type="checkbox"/> Facility maintains a written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) & (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR	
8. <input type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR	
9. <input type="checkbox"/> R2 facility uses an adequate sampling and analysis plan to assess incoming shipments - 10 CSR 25-9.020(3)(C)1.	GOR	
10. <input type="checkbox"/> R2 facility maintains a daily log of manifest number, wastes received, disposition of waste and corresponding sampling data - 10 CSR 25-9.020(3)(C)2.	GOR	
11. <input type="checkbox"/> R2 facility has a written closure plan which meets 40 CFR 264.112 requirements - 10 CSR 25-9.020(3)(C)3.	GOR	
12. <input type="checkbox"/> R2 facility provides financial assurance for closure - 10 CSR 25-9.020(3)(C)4.	GOR	

CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

INSPECTOR'S SIGNATURE

[Handwritten Signature]

DATE

9-18-95